

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

Civil No. 2:21-cv-10928

v.

Honorable Denise Page Hood

Currency \$3,840,772.58 U.S. Dollars
Constituting 125 International
Wire Transfers Seized from U.S.
Correspondent Bank, Citibank, et al.,

Defendants in Rem,

ADVOTIS GENERAL TRADING LLC,

Claimant.

VERIFIED CLAIM

CLAIMANT, Advotis General Trading, LLC (“Advotis”), by and through undersigned counsel, hereby files this *Verified Claim* pursuant to 18 U.S.C. § 983(a)(4)(A) and Rule G(5)(a) of the Supplemental Rules for Certain Admiralty and Maritime Claims, and states as follows:

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1. Identification of Property:

The specific properties being claimed are the funds associated with the following wire transactions, as identified in the Third Amended Complaint for Forfeiture in the above-styled case:

Wire No.	Wire Date	Amount
1	01/04/2021	\$13,156.00
2	01/04/2021	\$47,905.00
3	01/04/2021	\$49,465.00
4	12/31/2020	\$14,942.88
5	12/31/2020	\$24,967.00
6	12/31/2020	\$25,962.88
7	12/31/2020	\$29,962.88
8	12/31/2020	\$49,975.00
9	12/31/2020	\$56,765.00
10	12/30/2020	\$29,967.00
11	12/30/2020	\$29,967.00
12	12/30/2020	\$41,967.00
13	12/30/2020	\$49,485.00

14	12/30/2020	\$51,535.00
15	12/29/2020	\$13,752.00
16	12/29/2020	\$14,714.00
17	12/29/2020	\$29,954.00
18	12/29/2020	\$31,150.00
19	12/29/2020	\$49,685.00
20	12/28/2020	\$49,785.00
21	12/28/2020	\$20,100.00
22	12/28/2020	\$33,627.00
23	12/28/2020	\$34,477.88
24	12/28/2020	\$38,495.00
25	12/28/2020	\$44,955.00
26	12/28/2020	\$49,455.00
27	12/24/2020	\$50,455.00
28	12/24/2020	\$16,955.00
29	12/24/2020	\$38,335.00
30	12/24/2020	\$49,935.00
31	12/23/2020	\$23,232.00
32	12/23/2020	\$41,255.00

33	12/23/2020	\$49,955.00
34	12/23/2020	\$49,955.00
35	12/21/2020	\$56,092.00

2. Identity of Claimant:

Advotis is a foreign company established under the laws of the United Arab Emirates, with its principal office located at 1807 Al Reem Tower, Rega Al Buteen Deira, Dubai, UAE.

3. Interest in Property:

Advotis asserts a valid and legal interest in all of the properties identified in Paragraph 1 of this Verified Claim, as Advotis is the rightful owner of said properties.

4. Ownership Details:

MD Rayees Kadaikar is the sole owner of Advotis General Trading, LLC.

5. Lawful Acquisition of Property:

Advotis acquired the properties listed in Paragraph 1 of this Verified Claim through lawful and legitimate means, consistent with the requirements of 18 U.S.C. §§ 1956 and 1957. Claimant maintains that none of the seized assets were involved in

or derived from illegal activities such as money laundering or any other offenses specified under these statutes.¹

6. Objection to Venue:

Claimant objects to venue under 28 U.S.C. § 1395, asserting that the United States lacks proper venue in this matter. This statute governs the venue for civil forfeiture proceedings and specifies the districts where actions may be brought. Claimant reserves its right to challenge venue further in its motions to dismiss.

7. Objection to Jurisdiction:

Claimant objects to jurisdiction under 28 U.S.C. § 1355, which governs the jurisdiction of district courts over civil forfeiture proceedings. Claimant asserts that the court does not have subject-matter jurisdiction over the seized assets. This objection is raised pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(2) for lack of subject-matter jurisdiction and lack of personal jurisdiction, respectively.

8. Failure to State a Claim:

Claimant asserts that the United States has failed to state a claim upon which relief can be granted, as required by Fed. R. Civ. P. 12(b)(6). Claimant contends that

¹ Pursuant to Fed. R. Civ. P. 12(b)(1), 12(b)(2), 12(b)(3), and 12(b)(6), Claimant hereby raises its objections in its initial response out of an abundance of procedural caution and asserts that this Verified Claim serves as its initial response.

the Third Amended Complaint does not provide sufficient legal grounds to justify the forfeiture of the identified assets.

9. Due Process Considerations:

Claimant asserts that the seizure and forfeiture proceedings must comply with the due process requirements guaranteed by the Fifth Amendment of the U.S. Constitution. Claimant maintains that it has not been afforded adequate notice or opportunity to challenge the forfeiture before the seizure of its assets.

This 7th day of November 2024.

s/ Rebecca L. Castaneda
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VERIFICATION

Pursuant to 28 U.S.C. § 1746, MD Rayees Kadaikar, owner of Advotis General Trading, LLC hereby declares under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 7th day of November 2024.



MD Rayees Kadaikar
Owner of Advotis General Trading, LLC

CERTIFICATE OF SERVICE

This is to certify that I have this day electronically filed the foregoing Verified Claim with the Clerk of Court using the CM/ECF system, which will automatically send email notifications of such filing to all counsel of record in this matter.

This 7th day of November 2024.

s/ Rebecca L. Castaneda
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